

# EXHIBIT B

**FILED**

NOV 20 2018

U.S. DISTRICT COURT-WVND  
MARTINSBURG, WV 25401

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA**

**UNITED STATES OF AMERICA,**

**v.**

**WILLIAM LOREN HOFFMAN, III,**

**Defendant.**

**Criminal No.**

**3:18-CR- 61**

**Violations:**

**18 U.S.C. § 922(d)**

**18 U.S.C. § 922(m)**

**18 U.S.C. § 924(a)(2)**

**18 U.S.C. § 924(a)(3)(B)**

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

(Sale to a Prohibited Person)

On or about October 18, 2017 in Berkeley County, within the Northern District of West Virginia, defendant **WILLIAM LOREN HOFFMAN, III**, knowingly sold a firearm, that is a Hi-Point rifle, Model 4595, .45 ACP caliber, to a person known to the grand jury, knowing and having reasonable cause to believe that the person known to the grand jury had been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d) and 924(a)(2).

**COUNT TWO**

(Making False Entry in Records by Federal Firearms Dealer)

On or about October 18, 2017 in Berkeley County, within the Northern District of West Virginia, defendant **WILLIAM LOREN HOFFMAN, III**, a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, knowingly failed to make an appropriate entry in, made a false entry in, and failed to maintain a record the defendant was required to keep pursuant to Section 923 of Title 18, United States Code; in violation of Title 18, United States Code, Sections 922(m) and 924(a)(3)(B).

**COUNT THREE**

(Sale to a Prohibited Person)

On or about October 24, 2017 in Berkeley County, within the Northern District of West Virginia, defendant **WILLIAM LOREN HOFFMAN, III**, knowingly sold a firearm, that is a Springfield pistol Model XD-9, 9mm caliber, to a person known to the grand jury, knowing and having reasonable cause to believe that the person known to the grand jury had been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Sections 922(d) and 924(a)(2).

**COUNT FOUR**

(Making False Entry in Records by Federal Firearms Dealer)


On or about October 24, 2017 in Berkeley County, within the Northern District of West Virginia, defendant **WILLIAM LOREN HOFFMAN, III**, a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, knowingly failed to make an appropriate entry in, made a false entry in, and failed to maintain a record the defendant was required to keep pursuant to Section 923 of Title 18, United States Code; in violation of Title 18, United States Code, Sections 922(m) and 924(a)(3)(B).

A True Bill,

/s/

Grand Jury Foreperson

/s/

  
WILLIAM J. POWELL  
UNITED STATES ATTORNEY

Lara K. Omps-Botteicher  
Assistant United States Attorney